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April 7, 2021

VIA ECF

MEMO ENDORSED

Honorable Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Victor Rivera, Case No. 21-CR-221 (SHS)

Dear Judge Stein:

As the Court may recall, this firm represents defendant Victor Rivera in the referenced matter. Mr. Rivera self-surrendered and made his initial appearance before this Court on March 24, 2021, at which time he was released principally on a \$100,000 Personal Recognizance Bond that he signed along with certain travel restrictions. On March 30, 2021 I submitted a letter to this Court seeking a change to the conditions of Mr. Rivera's bail – to wit, the substitution of a second signatory on his Personal Recognizance Bond in place of the surrender of his wife's passport. On April 1, 2021 this Court "Memo Endorsed" my March 30, 2021 letter, authorizing such substitution. My March 30, 2021 letter application also stated that we would have that second signatory sign Mr. Rivera's Personal Recognizance Bond by April 6, 2021. We have been working diligently to secure such a second such signatory. After initially agreeing to do so, our first proposed signatory ultimately decided not to sign Mr. Rivera's Personal Recognizance Bond. We therefore have proposed a new signatory to the government. That new proposed signatory will tomorrow (April 8, 2021) be providing the government with the background and financial information that the government requested of her for purposes of approving her as a second signatory to Mr. Rivera's Personal Recognizance Bond.

We expect that this second proposed signatory to Mr. Rivera's Personal Recognizance Bond will meet with the government's approval and will, in fact, sign such Personal Recognizance Bond. We require a brief extension of time, though, to finalize the securing of such signature. Accordingly, we respectfully request that this Court enter an Order extending the date for Mr. Rivera to secure a second signatory on his Personal Recognizance Bond to April 14, 2021 (seven days from today). I have spoken with Assistant United States Attorney David Abramowicz, who consents to the instant request.

Thank you for your consideration and attention to this matter.

Respectfully submitted,

/s/

Harlan Protass

cc: David Abramowicz, Esq. (via ECF)
Assistant United States Attorney

Shawn Bostic (via e-mail)
U.S. Pretrial Services Officer

Defendant's request to extend the date for him to secure a second signatory on his Personal Recognizance Bond to April 14, 2021, is granted.

Dated: New York, New York
April 8, 2021

SO ORDERED:



Sidney H. Stein, U.S.D.J.